

Patricia M. French
Senior Attorney



300 Friberg Parkway
Westborough, Massachusetts 01581
(508) 836-7394
(508) 836-7039 (facsimile)
pfrench@nisource.com

July 25, 2005

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

From the Attorney General:

AG-1-54 (Supp.) AG-21-3 (Rev.)

From the Department:

DTE-9-6 DTE-9-10

From the MOC:

MOC-3-12

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Per Ground Rules Memorandum issued June 13, 2005:

Paul E. Osborne, Assistant Director – Rates and Rev. Requirements Div. (1 copy)

A. John Sullivan, Rates and Rev. Requirements Div. (4 copies)

Andreas Thanos, Assistant Director, Gas Division (1 copy)

Alexander Cochis, Assistant Attorney General (4 copies)

Service List (1 electronic copy)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE ATTORNEY GENERAL
D. T. E. 05-27

Date: July 25, 2005

Responsible: John E. Skirtich, Consultant (Revenue Requirements)

SUPPLEMENTAL RESPONSE

AG-1-54 Please provide an itemized list of all aircraft and watercraft leased or purchased by NiSource and the Company. For each aircraft and watercraft, please provide the make, model, year, rental charge and original book value.

Response: Neither NiSource Inc, nor Bay State Gas Company ("Bay State") own or lease any aircraft.

However, because the corporation's operating territory covers a major portion of the United States, an aircraft has been purchased by NiSource Corporate Services Company ("NCSC") for use in transporting both executives and employees around the country for business purposes. NCSC does permit its passenger aircraft to be used on business for Bay State Gas Company.

Corporate Transport Aircraft

2001 Hawker 800XP, serial number: 258530, FAA Registration
Number: N890SP
Original Book Value: \$12,580,831

In addition, NCSC owns two aircraft to patrol its pipelines facilities. The cost of the patrol planes is assigned to the pipeline company. No costs are assigned to Bay State for these two aircraft.

Patrol Airplanes

1998 Cessna 182S, serial number: 18280321, FAA Registration
Number: N61CE
Original Book Value: \$317,504

1998 Cessna 182S, serial number: 18280357, FAA Registration
Number: N63CE
Original Book Value: \$308,352

Supplemental Response

Neither NiSource Inc., nor NiSource Corporate Services Company own or lease watercraft.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
TWENTY FIRST SET OF INFORMATION REQUESTS FROM THE ATTORNEY
GENERAL
D. T. E. 05-27

Date: July 25, 2005

Responsible: Stephen H. Bryant, President

REVISED

AG-21-3 Provide a list and description of customer complaints as well as any refunds associated with Metscan, including reimbursement of telephone bills.

Response: Attachment AG-21-3 is a list of refunds to customers for telephone line repairs associated with the installation/removal of Metscan devices from which the customer names and accounts have been redacted. The list covers the period March 2002 to present. The information was originally produced without redactions and by this response the Company requests that all unredacted versions of the response be returned.

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

03/31/02	\$82.50
04/25/02	\$82.50
04/29/02	\$82.50
04/08/02	\$82.50
04/05/02	\$82.50
04/08/02	\$82.50
04/25/02	\$120.00
04/16/02	\$82.50
04/08/02	\$82.50
04/16/02	\$37.50
04/08/02	\$82.50
04/08/02	\$82.50
04/08/02	\$82.50
04/08/02	\$120.00
04/08/02	\$82.50
04/18/02	\$82.50
04/18/02	\$82.50
04/25/02	\$82.50
04/25/02	\$82.50
04/29/02	\$82.50
04/29/02	\$82.50
04/25/02	\$82.50
04/18/02	\$82.50
04/25/02	\$120.00
04/18/02	\$82.50
04/25/02	\$202.50
05/30/02	\$82.50
05/21/02	\$82.50
05/23/02	\$82.50
05/30/02	\$117.11
05/21/02	\$82.50
05/23/02	\$82.50
05/21/02	\$82.50
05/21/02	\$82.50
05/23/02	\$82.50
05/30/02	\$120.00
05/21/02	\$82.50
05/21/02	\$120.00
05/30/02	\$82.50
05/07/02	\$82.50
05/07/02	\$120.00
05/21/02	\$120.00
05/07/02	\$82.50
05/21/02	\$82.50
06/30/02	\$120.00

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

06/30/02	\$75.00
06/11/02	\$37.50
06/11/02	\$82.50
06/30/02	\$82.50
06/11/02	\$82.50
06/30/02	\$82.50
06/30/02	\$82.50
06/30/02	\$82.50
06/30/02	\$120.00
06/11/02	\$82.50
06/11/02	\$85.00
06/11/02	\$157.50
06/11/02	\$200.00
06/11/02	\$95.00
07/31/02	\$82.50
07/31/02	\$82.50
07/31/02	\$82.50
07/31/02	\$115.00
07/31/02	\$82.50
07/31/02	\$82.50
07/31/02	\$82.50
07/01/02	\$120.00
07/01/02	\$82.50
07/31/02	\$115.00
07/31/02	\$82.50
07/01/02	\$82.50
07/31/02	\$82.50
07/01/02	\$82.50
07/01/02	\$82.50
07/31/02	\$82.50
07/31/02	\$82.50
07/01/02	\$82.50
07/31/02	\$82.50
07/31/02	\$82.50
07/01/02	\$82.50
07/31/02	\$82.50
07/31/02	\$82.50
07/01/02	\$82.50
08/31/02	\$82.50
08/31/02	\$120.00
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$82.50
08/31/02	\$120.00
09/30/02	\$82.50
09/30/02	\$82.50
09/30/02	\$82.50
09/30/02	\$120.75
09/30/02	\$82.50
09/30/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$120.00
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
10/31/02	\$82.50
11/30/02	\$82.50
11/30/02	\$82.50
11/30/02	\$120.00
11/30/02	\$120.00
11/30/02	\$120.00
11/30/02	\$82.50
11/30/02	\$82.50
11/30/02	\$120.00
12/31/02	\$99.61
12/31/02	\$82.50
12/31/02	\$250.00
12/31/02	\$82.50
12/31/02	\$82.50
12/31/02	\$82.50
12/31/02	\$82.50
12/31/02	\$82.50
01/31/03	\$120.00
01/31/03	\$82.50
01/31/03	\$120.00
01/31/03	\$120.00
01/31/03	\$82.50
01/31/03	\$16.99
01/31/03	\$157.50

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

01/31/03	\$82.50
01/31/03	\$82.50
01/31/03	\$120.00
01/31/03	\$82.50
01/31/03	\$82.50
01/31/03	\$82.50
01/31/03	\$85.00
01/31/03	\$82.50
01/31/03	\$82.50
02/28/03	\$82.50
02/28/03	\$95.00
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$120.00
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$123.45
02/28/03	\$82.50
02/28/03	\$16.99
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$83.00
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$82.50
02/28/03	\$87.50
02/28/03	\$115.19
03/31/03	\$84.19
03/31/03	\$82.50
03/31/03	\$91.00
03/31/03	\$82.50
03/31/03	\$82.50
03/31/03	\$90.00
03/31/03	\$82.50
03/31/03	\$120.00
03/31/03	\$82.50
03/31/03	\$82.50
03/31/03	\$82.50
03/31/03	\$91.00

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

03/31/03	\$150.00
03/31/03	\$82.50
03/31/03	\$82.00
03/31/03	\$82.50
05/31/03	\$90.00
05/31/03	\$91.00
05/31/03	\$91.00
05/31/03	\$123.52
05/31/03	\$91.00
05/31/03	\$91.00
05/31/03	\$91.00
05/31/03	\$82.50
06/30/03	\$91.00
06/30/03	\$137.00
06/30/03	\$82.50
06/30/03	\$91.00
06/30/03	\$25.55
06/30/03	\$91.00
06/30/03	\$91.00
06/30/03	\$16.99
06/30/03	\$91.00
06/30/03	\$91.00
06/30/03	\$82.50
06/30/03	\$91.00
06/30/03	\$87.70
06/30/03	\$91.00
06/30/03	\$91.00
06/30/03	\$137.00
06/30/03	\$91.00
06/30/03	\$76.50
07/31/03	\$137.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
07/31/03	\$91.00
08/31/03	\$137.00
08/31/03	\$75.00
08/31/03	\$91.00
08/31/03	\$104.99
09/30/03	\$91.00

REDACTED

Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan

09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$16.99
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$137.00
09/30/03	\$137.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
09/30/03	\$91.00
10/31/03	\$132.50
10/31/03	\$91.00
10/31/03	\$91.00
10/31/03	\$137.00
10/31/03	\$91.00
10/31/03	\$137.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$137.00
11/30/03	\$263.00
11/30/03	\$94.00
11/30/03	\$91.00
11/30/03	\$225.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$95.00
11/30/03	\$137.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$91.00
11/30/03	\$82.50

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

11/30/03	\$90.00
11/30/03	\$113.60
11/30/03	\$82.50
12/31/03	\$91.00
12/31/03	\$91.00
12/31/03	\$180.00
12/19/03	-\$91.00
12/31/03	\$95.00
12/31/03	\$91.00
12/31/03	\$91.00
01/31/04	\$91.00
01/31/04	\$91.00
01/31/04	\$91.00
01/31/04	\$137.00
01/31/04	\$91.00
01/31/04	\$91.00
01/31/04	\$91.00
01/31/04	\$91.00
01/31/04	\$263.71
01/31/04	\$120.00
02/29/04	\$91.00
02/29/04	\$90.00
02/29/04	\$91.00
02/29/04	\$225.00
02/29/04	\$91.00
02/29/04	\$91.00
02/29/04	\$137.00
02/29/04	\$91.00
02/29/04	\$137.00
02/29/04	\$255.00
02/29/04	\$91.00
02/29/04	\$91.00
02/29/04	\$91.00
02/29/04	\$91.00
03/31/04	\$91.00
03/31/04	\$91.00
04/30/04	\$91.00
04/30/04	\$91.00
04/30/04	\$91.00
04/30/04	\$147.50
04/30/04	\$91.00
04/30/04	\$91.00
05/31/04	\$229.00
05/31/04	\$91.00
05/31/04	\$50.00
05/31/04	\$425.00

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

05/31/04	\$170.00
05/31/04	\$91.00
05/31/04	\$91.00
05/31/04	\$91.00
05/31/04	\$91.00
05/31/04	\$91.00
05/31/04	\$137.00
05/31/04	\$91.00
05/31/04	\$82.50
06/30/04	\$91.00
06/30/04	\$120.00
06/30/04	\$91.00
06/30/04	\$91.00
06/30/04	\$91.00
06/30/04	\$91.00
06/30/04	\$110.00
06/30/04	\$91.00
06/30/04	\$91.00
06/30/04	\$600.00
06/30/04	\$19.99
06/30/04	\$91.00
07/31/04	\$375.00
07/31/04	\$110.00
07/31/04	\$91.00
07/31/04	\$91.00
07/31/04	\$110.00
08/31/04	\$137.00
08/31/04	\$202.00
08/31/04	\$137.00
09/30/04	\$91.00
09/30/04	\$91.00
09/30/04	\$82.50
09/30/04	\$91.00
09/30/04	\$91.00
09/30/04	\$91.00
09/30/04	\$95.00
09/30/04	\$142.50
09/30/04	\$91.00
10/31/04	\$91.00
10/31/04	\$125.00
10/31/04	\$91.00
10/31/04	\$91.00
10/31/04	\$75.00
10/31/04	\$91.00
10/31/04	\$91.00
10/31/04	\$91.00

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

10/31/04	\$137.00
10/31/04	\$60.00
10/31/04	\$149.82
10/31/04	\$182.41
10/31/04	\$91.00
10/31/04	\$91.00
11/30/04	\$137.00
11/30/04	\$91.00
11/30/04	\$137.00
11/30/04	\$19.99
11/30/04	\$91.00
11/30/04	\$91.00
11/30/04	\$82.50
11/30/04	\$137.00
11/30/04	\$137.00
11/30/04	\$324.45
11/30/04	\$91.00
11/30/04	\$91.00
11/30/04	\$229.00
11/30/04	\$259.00
11/30/04	\$110.00
11/30/04	\$91.00
11/30/04	\$91.00
11/30/04	\$135.00
12/31/04	\$91.00
12/31/04	\$91.00
12/31/04	\$248.00
12/31/04	\$165.00
12/31/04	\$279.50
12/31/04	\$216.00
12/31/04	\$91.00
12/31/04	\$91.00
12/31/04	\$91.00
12/31/04	\$91.00
01/31/05	\$81.50
01/31/05	\$91.00
01/31/05	\$91.00
01/31/05	\$91.00
01/31/05	\$91.00
01/31/05	\$225.00
02/28/05	\$92.00
02/28/05	\$91.00
02/28/05	\$91.00
02/28/05	\$91.00
02/28/05	\$102.00

REDACTED

**Bay State Gas Company
Customer Payments for Telephone Line Repairs
Associated With Metscan**

02/28/05	\$91.00
02/28/05	\$91.00
02/28/05	\$137.00
02/28/05	\$91.00
02/28/05	\$137.00
02/28/05	\$91.00
02/28/05	\$91.00
03/31/05	\$91.00
03/31/05	\$91.00
03/31/05	\$91.00
03/31/05	\$91.00
03/31/05	\$91.00
03/31/05	\$91.00
03/31/05	\$137.00
03/31/05	\$120.00
04/30/05	\$91.00
04/30/05	\$137.00
04/30/05	\$266.25
04/30/05	\$91.00
04/30/05	\$137.00
05/31/05	\$91.00
05/31/05	\$135.00
05/31/05	\$135.00
	\$43,825.24

REDACTED

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
NINTH SET OF INFORMATION REQUESTS FROM THE D.T.E.
D. T. E. 05-27

Date: July 25, 2005

Responsible: John E. Skirtich, Consultant (Revenue Requirements)

DTE-9-6 Refer to Exh. BSG/JES-1, Workpaper JES-6, at 21. Please provide a breakdown by residential, commercial and industrial, and transportation services of the monthly net write-offs under each service area for years 2002 through 2004.

Response: Please see Attachment DTE-9-6 for Net Write-offs by customer class by service area.

Bay State Gas Company
Net Write-offs by Customer Class by Service Area for 2002-2004

2002	Brockton			Springfield			Lawrence			Summary
	Residential	Commercial	Total	Residential	Commercial	Total	Residential	Commercial	Total	Total
	(1)	(2)	(1 + 2 = 3)	(4)	(5)	(4 + 5 = 6)	(7)	(8)	(7 + 8 = 9)	(3+6+9 = 10)
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
January	161,414	(26,538)	134,876	196,489	(20,824)	175,665	108,460	15,092	123,552	434,092
February	150,525	87,243	237,768	182,220	41,867	224,087	93,583	25,991	119,574	581,429
March	63,690	8,949	72,639	118,177	12,873	131,050	46,585	290,455	337,039	540,728
April	47,068	23,386	70,454	89,633	24,159	113,793	110,566	50,283	160,849	345,096
May	102,952	66,385	169,337	159,541	33,666	193,207	69,879	(4,203)	65,676	428,220
June	172,722	53,748	226,471	241,281	24,936	266,218	182,082	(188,908)	(6,826)	485,862
July	286,672	16,293	302,965	429,111	57,245	486,356	178,096	14,526	192,622	981,943
August	331,696	63,260	394,956	419,297	52,026	471,323	276,053	157,375	433,428	1,299,706
September	243,383	20,107	263,490	368,023	24,454	392,477	182,118	21,328	203,446	859,412
October	153,787	24,554	178,341	371,249	(14,720)	356,529	191,856	14,784	206,640	741,509
November	37,960	5,321	43,281	251,861	37,203	289,064	115,075	25,517	140,592	472,937
December	<u>84,655</u>	<u>(9,580)</u>	<u>75,074</u>	<u>165,023</u>	<u>13,769</u>	<u>178,792</u>	<u>58,089</u>	<u>43,579</u>	<u>101,668</u>	<u>355,535</u>
Total	<u>1,836,524</u>	<u>333,127</u>	<u>2,169,651</u>	<u>2,991,904</u>	<u>286,655</u>	<u>3,278,559</u>	<u>1,612,442</u>	<u>465,817</u>	<u>2,078,259</u>	<u>7,526,468</u>

2003	Brockton			Springfield			Lawrence			Summary
	Residential	Commercial	Total	Residential	Commercial	Total	Residential	Commercial	Total	Total
	(1)	(2)	(1 + 2 = 3)	(4)	(5)	(4 + 5 = 6)	(7)	(8)	(7 + 8 = 9)	(3+6+9 = 10)
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
January	50,749	(2,742)	48,007	174,505	(18,064)	156,441	67,903	7,052	74,955	279,403
February	37,144	(9,090)	28,054	98,112	(1,173)	96,939	26,624	(1,137)	25,486	150,480
March	44,835	18,968	63,803	53,168	(12,273)	40,895	48,134	3,103	51,238	155,936
April	(56,717)	(15,717)	(72,434)	(48,926)	(11,501)	(60,427)	258,474	19,067	277,541	144,681
May	199,931	25,805	225,737	341,161	15,332	356,493	(89,859)	(4,807)	(94,666)	487,563
June	175,046	35,356	210,402	240,179	21,695	261,875	193,226	50,912	244,137	716,413
July	249,349	62,946	312,295	348,326	43,105	391,431	167,437	3,539	170,976	874,702
August	369,555	91,997	461,552	539,440	103,568	643,008	284,068	20,939	305,007	1,409,567
September	506,628	92,439	599,066	649,042	12,278	661,319	213,033	29,000	242,033	1,502,418
October	359,247	5,250	364,497	517,165	5,835	523,000	255,923	17,455	273,377	1,160,874
November	210,107	81,848	291,955	512,006	759,173	1,271,179	278,659	9,890	288,549	1,851,684
December	<u>180,673</u>	<u>(22,736)</u>	<u>157,938</u>	<u>291,626</u>	<u>549,551</u>	<u>841,177</u>	<u>214,246</u>	<u>(10,795)</u>	<u>203,452</u>	<u>1,202,566</u>
Total	<u>2,326,548</u>	<u>364,325</u>	<u>2,690,873</u>	<u>3,715,803</u>	<u>1,467,526</u>	<u>5,183,330</u>	<u>1,917,868</u>	<u>144,217</u>	<u>2,062,085</u>	<u>9,936,287</u>

2004	Brockton			Springfield			Lawrence			Summary
	Residential	Commercial	Total	Residential	Commercial	Total	Residential	Commercial	Total	Total
	(1)	(2)	(1 + 2 = 3)	(4)	(5)	(4 + 5 = 6)	(7)	(8)	(7 + 8 = 9)	(3+6+9 = 10)
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
January	165,486	21,205	186,692	288,302	(518,778)	(230,475)	118,963	2,029	120,991	77,208
February	62,000	15,191	77,192	81,963	26,150	108,113	49,790	12,075	61,865	247,170
March	78,140	4,994	83,134	58,262	13,890	72,152	79,704	7,733	87,437	242,724
April	75,489	35,264	110,754	108,926	509,370	618,296	86,273	5,657	91,930	820,979
May	108,051	14,820	122,871	90,688	1,080	91,769	113,289	16,211	129,500	344,140
June	(69,440)	(2,234)	(71,674)	(71,144)	(3,797)	(74,941)	(40,688)	(1,642)	(42,330)	(188,945)
July	486,200	162,898	649,098	662,996	190,932	853,929	495,372	145,104	640,476	2,143,503
August	460,266	30,278	490,544	401,034	67,124	468,159	370,181	26,134	396,315	1,355,018
September	345,408	76,289	421,697	446,980	15,383	462,363	219,985	29,685	249,670	1,133,730
October	254,019	35,150	289,169	544,065	26,100	570,165	266,311	5,415	271,726	1,131,060
November	238,553	1,699	240,252	359,790	7,988	367,778	299,761	9,644	309,405	917,435
December	<u>174,054</u>	<u>(5,643)</u>	<u>168,411</u>	<u>451,508</u>	<u>(24,691)</u>	<u>426,817</u>	<u>241,374</u>	<u>15,900</u>	<u>257,275</u>	<u>852,503</u>
Total	<u>2,378,227</u>	<u>389,913</u>	<u>2,768,140</u>	<u>3,423,371</u>	<u>310,752</u>	<u>3,734,124</u>	<u>2,300,315</u>	<u>273,946</u>	<u>2,574,261</u>	<u>9,076,524</u>

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
NINTH SET OF INFORMATION REQUESTS FROM THE D.T.E.
D. T. E. 05-27

Date: July 25, 2005

Responsible: John E. Skirtich, Consultant (Revenue Requirements)

DTE-9-10 Refer to Exh. BSG/JES-1, Workpaper JES-6, at 21. For each month for the period 2002 through 2004, please provide under each service area the number of account write-offs for amounts that are:

- (1) Less than \$500;
- (2) Greater than or equal to \$500 but less than \$1,000;
- (3) Greater than or equal to \$1,000 but less than \$5,000;
- (4) Greater than or equal to \$5,000 but less than \$10,000;
- (5) Greater than or equal to \$10,000 but less than \$50,000;
- (6) Greater than or equal to \$50,000 but less than \$100,000; and
- (7) Greater than or equal to \$100,000.

Break down the number of account write-offs by residential, commercial and industrial, and transportation service. Describe the Company's method and explain any assumptions used.

Response: Attachment DTE-9-10 provides the number of total account write-offs by customer class and service area. The Company does not distinguish between tariff and transportation write-offs. The Company's write-off policy is provided in the response to AG-1-71.

Bay State Gas Company
Number of Account Write-offs by Service Area
Brockton Service Area

Month	Year	Residential Accounts								Commercial Accounts							
		<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000	Totals	<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000	Totals
1	2002	304	62	80	0	0	0	0	446	46	1	0	0	0	0	0	47
2	2002	329	53	60	4	0	0	0	446	88	17	22	0	2	0	0	129
3	2002	231	35	31	2	0	0	0	299	41	5	6	0	0	0	0	52
4	2002	271	36	25	1	0	0	0	333	43	10	6	1	0	0	0	60
5	2002	235	54	41	2	0	0	0	332	52	7	13	1	1	0	0	74
6	2002	303	97	52	0	0	0	0	452	70	13	12	1	1	0	0	97
7	2002	315	162	92	1	0	0	0	570	90	12	9	1	0	0	0	112
8	2002	353	144	125	4	0	0	0	626	49	7	16	2	0	0	0	74
9	2002	347	125	92	0	0	0	0	564	54	11	8	3	0	0	0	76
10	2002	399	85	71	2	0	0	0	557	57	7	5	1	1	0	0	71
11	2002	327	49	45	1	0	0	0	422	98	3	4	0	0	0	0	105
12	2002	336	26	30	1	0	0	0	393	58	2	4	1	0	0	0	65
Totals		3,750	928	744	18	0	0	0	5,440	746	95	105	11	5	0	0	962
1	2003	300	45	34	1	0	0	0	380	56	2	2	1	0	0	0	61
2	2003	277	24	25	0	0	0	0	326	58	3	3	0	0	0	0	64
3	2003	260	16	10	3	0	0	0	289	40	5	4	0	1	0	0	50
4	2003	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2003	431	99	44	1	0	0	0	575	110	11	5	1	0	0	0	127
6	2003	246	82	64	1	1	0	0	394	46	6	14	0	0	0	0	66
7	2003	279	134	88	1	0	0	0	502	71	18	19	3	0	0	0	111
8	2003	279	184	131	4	0	0	0	598	56	22	23	5	0	0	0	106
9	2003	305	228	215	1	0	0	0	749	51	9	23	5	1	0	0	89
10	2003	359	193	149	3	0	0	0	704	48	14	14	3	0	0	0	79
11	2003	481	131	95	2	0	0	0	709	119	9	8	3	2	0	0	141
12	2003	416	71	81	1	1	0	0	570	59	7	7	1	0	0	0	74
Totals		3,633	1,207	936	18	2	0	0	5,796	714	106	122	22	4	0	0	968
1	2004	421	93	82	1	0	0	0	597	55	8	5	2	0	0	0	70
2	2004	308	35	34	2	0	0	0	379	34	3	4	0	0	0	0	41
3	2004	333	31	34	1	0	0	0	399	44	3	3	0	0	0	0	50
4	2004	243	40	29	0	0	0	0	312	73	6	3	1	1	0	0	84
5	2004	180	72	39	2	0	0	0	293	41	10	5	0	0	0	0	56
6	2004	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2004	515	241	148	3	0	0	0	907	138	26	35	5	2	0	0	206
8	2004	295	198	185	2	0	0	0	680	60	25	22	2	0	0	0	109
9	2004	415	159	139	2	0	0	0	715	63	18	16	2	2	0	0	101
10	2004	304	160	120	1	0	0	0	585	67	9	21	1	0	0	0	98
11	2004	330	137	123	1	0	0	0	591	54	6	10	2	0	0	0	72
12	2004	331	90	73	2	1	0	0	497	43	3	7	1	0	0	0	54
Totals		3,675	1,256	1,006	17	1	0	0	5,955	672	117	131	16	5	0	0	941

Bay State Gas Company
 Number of Account Write-offs by Service Area
 Springfield Service Area

Month	Year	Residential Accounts							Totals	Commercial Accounts							Totals
		<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000		<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000	
1	2002	386	71	93	0	0	0	0	550	16	1	1	0	0	0	0	18
2	2002	358	68	82	1	0	0	0	509	42	14	13	0	0	0	0	69
3	2002	293	59	51	0	0	0	0	403	22	2	9	2	0	0	0	35
4	2002	302	58	45	0	0	0	0	405	36	4	7	1	0	0	0	48
5	2002	296	70	54	0	0	0	0	420	31	4	7	4	0	0	0	46
6	2002	347	103	86	3	0	0	0	539	33	2	3	2	1	0	0	41
7	2002	318	133	135	10	1	0	0	597	40	5	6	3	2	0	0	56
8	2002	338	159	152	2	0	0	0	651	39	6	8	2	0	0	0	55
9	2002	364	126	127	4	0	0	0	621	36	2	3	1	1	0	0	43
10	2002	390	138	161	3	0	0	0	692	29	4	7	0	0	0	0	40
11	2002	374	82	135	1	0	0	0	592	31	3	4	2	1	0	0	41
12	2002	426	87	63	2	0	0	0	578	25	2	1	0	1	0	0	29
Totals		4,192	1,154	1,184	26	1	0	0	6,557	380	49	69	17	6	0	0	521
1	2003	405	65	66	2	1	0	0	539	36	2	1	0	0	0	0	39
2	2003	328	45	38	1	1	0	0	413	31	1	2	0	0	0	0	34
3	2003	316	31	27	0	0	0	0	374	31	3	2	0	0	0	0	36
4	2003	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2003	543	139	86	2	0	0	0	770	59	9	8	0	0	0	0	76
6	2003	309	106	82	2	1	0	0	500	33	9	4	0	1	0	0	47
7	2003	348	145	128	0	1	0	0	622	32	11	15	0	1	0	0	59
8	2003	320	232	204	3	0	0	0	759	43	13	12	4	2	0	0	74
9	2003	334	216	276	4	0	0	0	830	44	7	5	0	0	0	0	56
10	2003	374	175	228	1	2	0	0	780	45	7	5	0	2	0	0	59
11	2003	731	164	202	7	1	0	0	1,105	153	23	17	1	2	0	1	197
12	2003	451	98	119	3	0	0	0	671	43	8	2	1	1	0	1	56
Totals		4,459	1,416	1,456	25	7	0	0	7,363	550	93	73	6	9	0	2	733
1	2004	496	95	113	0	3	0	0	707	36	1	4	1	0	0	0	42
2	2004	365	38	46	0	0	0	0	449	29	1	3	0	1	0	0	34
3	2004	341	53	35	0	0	0	0	429	32	1	3	1	0	0	0	37
4	2004	276	70	45	0	1	0	0	392	31	0	6	0	0	0	1	38
5	2004	185	86	50	0	0	0	0	321	27	10	3	0	0	0	0	40
6	2004	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2004	558	258	235	4	1	0	0	1,056	70	23	17	5	3	0	0	118
8	2004	268	156	149	4	1	0	0	578	36	14	11	2	2	0	0	65
9	2004	407	156	170	5	1	0	0	739	48	14	6	1	0	0	0	69
10	2004	413	168	231	7	0	0	0	819	35	9	8	0	1	0	0	53
11	2004	404	126	156	4	1	0	0	691	27	3	8	0	0	0	0	38
12	2004	409	146	177	4	1	0	0	737	21	0	5	0	0	0	0	26
Totals		4,122	1,352	1,407	28	9	0	0	6,918	392	76	74	10	7	0	1	560

Bay State Gas Company
Number of Account Write-offs by Service Area
Lawrence Service Area

Month	Year	Residential Accounts							Totals	Commercial Accounts							Totals
		<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000		<\$500	<\$1000	<\$5000	<\$10,000	<\$50,000	<\$100,000	>\$100,000	
1	2002	202	45	56	0	0	0	0	303	12	1	6	0	0	0	0	19
2	2002	174	42	54	0	0	0	0	270	15	8	9	0	0	0	0	32
3	2002	143	18	27	2	0	0	0	190	9	2	2	4	2	0	1	20
4	2002	170	47	50	1	0	0	0	268	19	1	3	2	1	0	0	26
5	2002	132	48	30	1	0	0	0	211	17	2	4	0	0	0	0	23
6	2002	197	82	74	3	0	0	0	356	27	2	2	0	0	0	0	31
7	2002	162	94	69	1	0	0	0	326	24	5	4	0	0	0	0	33
8	2002	156	90	108	2	1	0	0	357	19	2	8	1	1	1	0	32
9	2002	185	88	70	1	0	0	0	344	15	7	4	0	0	0	0	26
10	2002	242	99	82	1	0	0	0	424	17	2	1	0	0	0	0	20
11	2002	199	84	54	0	0	0	0	337	23	3	10	0	0	0	0	36
12	2002	221	36	30	0	0	0	0	287	22		5	0	1	0	0	28
Totals		2,183	773	704	12	1	0	0	3,673	219	35	58	7	5	1	1	326
1	2003	232	45	28	1	0	0	0	306	9	2	2	1	0	0	0	14
2	2003	153	23	13	3	0	0	0	192	14	1	0	0	0	0	0	15
3	2003	174	14	18	0	0	0	0	206	13	0	2	0	0	0	0	15
4	2003	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	2003	273	97	44	2	0	0	0	416	42	6	1	2	0	0	0	51
6	2003	183	78	75	0	0	0	0	336	23	4	4	0	1	0	0	32
7	2003	185	99	65	1	0	0	0	350	20	5	4	0	0	0	0	29
8	2003	182	123	131	0	0	0	0	436	24	6	9	0	0	0	0	39
9	2003	204	116	109	1	0	0	0	430	26	8	15	0	0	0	0	49
10	2003	208	114	110	1	1	0	0	434	23	6	9	0	0	0	0	38
11	2003	331	113	116	2	1	0	0	563	38	3	1	1	1	0	0	44
12	2003	255	90	81	2	0	0	0	428	15	1	2	1	1	1	0	21
Totals		2,380	912	790	13	2	0	0	4,097	247	42	49	5	3	1	0	347
1	2004	268	51	57	0	0	0	0	376	13	1	2	0	0	0	0	16
2	2004	230	32	32	0	0	0	0	294	14	1	0	2	0	0	0	17
3	2004	276	44	27	3	0	0	0	350	19	4	3	0	0	0	0	26
4	2004	181	49	34	1	0	0	0	265	14	2	2	0	0	0	0	18
5	2004	133	75	48	0	0	0	0	256	8	2	4	1	0	0	0	15
6	2004	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7	2004	336	231	180	2	0	0	0	749	35	9	9	1	1	1	0	56
8	2004	156	91	184	5	0	0	0	436	21	7	8	0	0	0	0	36
9	2004	238	93	102	1	0	0	0	434	22	5	12	0	0	0	0	39
10	2004	248	154	110	1	0	0	0	513	24	5	5	0	0	0	0	34
11	2004	239	109	160	1	0	0	0	509	15	2	5	1	0	0	0	23
12	2004	229	73	126	2	0	0	0	430	23	4	5	0	1	0	0	33
Totals		2,534	1,002	1,060	16	0	0	0	4,612	208	42	55	5	2	1	0	313

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
THIRD SET OF INFORMATION REQUESTS FROM THE MASS OIL HEAT COUNCIL
D. T. E. 05-27

Date: July 25, 2005

Responsible: John E. Skirtich, Consultant (Revenue Requirements)

MOC-3-12 At page 9 of his testimony, Mr. Skirtich states that the appliance sales and installation activity of the Company's EP&S group is recorded below the line and is not considered for purposes of determining Bay State's revenue requirement. With regard to that statement, provide the following information:

(a) please describe and quantify in detail the expenses that are associated with the below-the-line costs of EP&S associated with appliance sales and installation activities;

(b) please identify, describe and explain the reason for the Company's choice of above-the-line and below-the-line expenses for the EP&S group. Please provide any relevant documentation; and

(c) please identify and describe the manner by which the Company's EP&S group distinguishes between expenses that are considered above-the-line and recoverable versus below-the-line and not recoverable. Please provide any policy statements, guidelines, or other documentation in this regard.

Response: (a) Please refer to the response provided to AG-11-06 and page 51 of the Company's Annual Return to the Department for the requested year ended December 31, 2004, data.

(b) Please refer to the Company's response to RR-DTE-19.

(c) Appliance sales and installations activities are recorded below the line. Expenses related to fees for services, guardian care, and water heater rentals are recorded above the line.

Cost of goods sold for the below the line activities are directly charged to the activity. That includes labor and parts and materials.

Other costs are allocated to specific activities, including below the line activities. Bad Debt Expense is charged to the below the line activities based on the receivables for those activities. Marketing Expense is allocated based on the costs directly incurred for the below the line activities. Other overhead expenses are allocated to above and below the line activities based on the breakdown of direct labor expenses across the activities.